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IN THE UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)

Plaintiff,)

v.)

CHARLES CATHCART *et al.*)

Defendants.)

Civil No. 07-4762-PJH
United States's Motion for Leave to File
First Amended Complaint
 Hearing: April 23, 2008, 9:00 AM

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the United States brings this memorandum in support of its Motion for Leave to File First Amended Complaint, a copy of which is attached as Exhibit A to the accompanying memorandum in support of this motion. The United States seeks to amend its complaint to add three additional defendants: Optech Limited and two of its principals, Charles Hsin and Franklin Thomason and also to clarify several factual allegations in the original complaint. The United States brings this motion, because all

1 defendants will not consent to a stipulation that the United States be given leave to file its
2 amended complaint.

3
4 Dated: March 13, 2008

5 Respectfully submitted,

6 JOSEPH P. RUSSONIELLO
7 United States Attorney

8 /s/ Allyson B. Baker
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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2008, I electronically filed the foregoing motion, memorandum in support of the foregoing motion, and notice of motion with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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I further certify that on March 13, 2008, service of the foregoing was made upon the following by depositing a copy in the United States mail, postage prepaid:

Yuri Debevc (*pro se*)
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/s/ Allyson B. Baker
ALLYSON B. BAKER